Case 1-19-41555-ess Doc 28-1 Filed 06/03/19 Entered 06/03/19 17:02:28

Case 1-19-41555-cec Doc 11 Filed 04/16/19 Entered 04/16/19 12:31:57

HEARING DATE: MAY 22, 2019 HEARING TIME: 2:30 P.M.

TARTER KRINSKY & DROGIN LLP

Attorneys for Factory Lessor, LLC 1350 Broadway, 11<sup>th</sup> Floor New York, New York 10018 (212) 216-8000 Rocco A. Cavaliere, Esq.

UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF NEW YORK

|                 | X |                          |
|-----------------|---|--------------------------|
| In re:          | • |                          |
|                 | 1 | Chapter 11               |
| PEEQ MEDIA LLC, | : |                          |
|                 |   | Case No.: 19-41555 (cec) |
| Debtor.         | 3 |                          |
|                 | X |                          |

NOTICE OF MOTION OF FACTORY LESSOR, LLC FOR AN ORDER (I) PURSUANT TO § 365(d)(3) OF THE BANKRUPTCY CODE COMPELLING THE DEBTOR TO PAY ALL OUTSTANDING POST-PETITION OBLIGATIONS AND (II) GRANTING ADDITIONAL AND RELATED RELIEF

TO: THE HONORABLE CARLA E. CRAIG CHIEF UNITED STATES BANKRUPTCY JUDGE

PLEASE TAKE NOTICE, that upon the motion (the "Motion") dated April 15, 2019, Factory Lessor, LLC (the "Landlord") shall move before the Honorable Carla E. Craig, Chief United States Bankruptcy Judge, in her courtroom at the United States Bankruptcy Court, Eastern District of New York, 271-C Cadman Plaza East, Brooklyn, New York, 11201, on May 22, 2019 at 2:30 p.m.. or as soon thereafter as counsel may be heard, for an order (i) compelling the Debtor to pay Landlord all unpaid post-petition obligations due the Landlord pursuant to section 365(d)(3) of the Bankruptcy Code, and (ii) granting such other additional and related relief as this Court deems just and proper.

Case 1-19-41555-ess Doc 28-1 Filed 06/03/19 Entered 06/03/19 17:02:28

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PLEASE TAKE FURTHER NOTICE, that objections, if any, to the relief requested in the

Motion shall be (i) filed with the Clerk of the Bankruptcy Court on the Court's ECF system; and

served upon (ii) Tarter Krinsky & Drogin LLP, 1350 Broadway, 11th Floor, New York, New York

10018, Attn: Rocco Cavaliere, Esq. and (iii) delivered to the chambers of the Honorable Carla E.

Craig, United States Bankruptcy Judge, so that same are received on or before 5:00 p.m. on May 15,

2019.

Dated: New York, New York

April 16, 2019

TARTER KRINSKY & DROGIN LLP

Attorneys for Factory Lessor, LLC

By: s/Rocco A. Cavaliere

Rocco A. Cavaliere 1350 Broadway, 11th Floor

New York, New York 10018

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